

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

LEVINE HAT CO.,)	
)	
Plaintiff,)	
)	
v.)	No. 4:16-CV-1132-SNLJ
)	
INNATE INTELLIGENCE, LLC,)	
<i>et al.</i> ,)	
)	
Defendants.)	

**DEFENDANT PROFAX, INC.'S REQUEST FOR ADDITIONAL TIME
TO FILE MOTION FOR PRELIMINARY APPROVAL OF SETTLEMENT**

COMES NOW Defendant Profax, Inc. ("Profax"), through its undersigned counsel, and respectfully requests that the Court allow the Parties additional time to file their Motion for Preliminary Approval of Class Settlement. In support of this Request, Profax states as follows:

1. Following an update to the Court regarding status of settlement negotiations, the Court on December 3, 2019, entered a docket Order providing that the Parties' motion for preliminary approval of class settlement be filed by December 13, 2019. (Dkt. 164.)

2. Upon Profax's request, the Court allowed the Parties three additional business days, through and including December 18, 2019, in which to file their motion for preliminary approval of class settlement while the Parties were in the process of reviewing and finalizing the settlement documents and motion for preliminary approval. (Dkt. 165.)

3. The Parties have now completed their review of and approved the settlement documents, which have been circulated for signature.

4. Profax has undertaken the task of assembling the motion package. Several of the signatories are located outside Missouri and some are currently traveling outside of their home

domiciles with limited access to communications technologies, making the logistics of obtaining signatures unusually difficult.

5. Accordingly, Profax respectfully requests that the Parties be allowed through and including December 23, 2019, to file their motion for preliminary approval of class settlement. Profax will endeavor to file the motion package prior to December 23, if logistically possible.

6. This motion is made in good faith in the interests of justice and efficiency, and not for purposes of delay.

WHEREFORE, Defendant Profax, Inc. respectfully requests that the Court allow the Parties through and including December 23, 2019, in which to file their motion for preliminary approval of class settlement.

December 19, 2019

Respectfully submitted,

GREENSFELDER, HEMKER & GALE, P.C.

By /s/ Mary Ann L. Wymore
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Attorneys for Defendant Profax, Inc.

CERTIFICATE OF SERVICE

The undersigned certifies that on this 19th day of December, 2019, a true and correct copy of the foregoing was filed with the Clerk of the Court to be served by operation of the Court's electronic filing system on all attorneys of record.

/s/ Mary Ann L. Wymore